

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

JEFF SCHENK (CABN 234355)
JOHN C. BOSTIC (CABN 264367)
ROBERT S. LEACH (CABN 196191)
KELLY I. VOLKAR (CABN 301377)
Assistant United States Attorneys

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5061
Fax: (408) 535-5066
Email: Robert.Leach@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 18-CR-00258 EJD
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	REGARDING CONDITIONS OF RELEASE AND
v.)	APPEARANCE BOND
)	
RAMESH BALWANI,)	
)	
Defendant.)	
)	

STIPULATION

Following the jury's verdicts on July 7, 2022, the government sought and the Court ordered modifications to the June 15, 2018 Order Setting Conditions of Release and Appearance Bond for the defendant. *See* ECF No. 8. Specifically, the Court increased the amount of the bond to \$750,000 and required that it be secured. The Court ordered further that the defendant must not travel outside the Northern District of California without the approval of Pretrial Services and notice to the government. The parties respectfully request that the Court issue the accompanying Proposed [Order] to memorialize these modifications.

IT IS SO STIPULATED.

DATED: July 14, 2022

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

/s/ Robert S. Leach

JEFF SCHENK
JOHN C. BOSTIC
ROBERT S. LEACH
KELLY I. VOLKAR
Assistant United States Attorneys

DATED: July 14, 2022

Respectfully submitted,

ORRICK HERRINGTON & SUTCLIFFE
LLP

/s/ Jeffrey B. Coopersmith

JEFFREY B. COOPERSMITH
AMY WALSH
STEPHEN A. CAZARES
Attorneys for Defendant
RAMESH BALWANI

[PROPOSED] ORDER

Good cause appearing, the Court's June 15, 2018 Order Setting Conditions of Release and Appearance Bond [ECF No. 8] is modified as follows: The amount of bond is set at \$750,000 and shall be secured by cash or real property. Further, the defendant must not travel outside the Northern District of California without the approval of Pretrial Services and notice to the government.

All other conditions of the June 15, 2018 Order Setting Conditions of Release and Appearance Bond [ECF No. 8] shall remain in effect.

IT IS SO ORDERED.

DATED: July __, 2022

HON. EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE